

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION
Civil Action No. 4:14-cv-00131-WTM-GRS

DANIEL DEFENSE, INC.,)	CIVIL ACTION NO. 4:14-cv-00131-WTM-GRS
)	
Plaintiff,)	
)	
v.)	
)	
REMINGTON OUTDOOR COMPANY,)	
INC., AKA FREEDOM GROUP, INC. and)	
REMINGTON ARMS COMPANY, LLC)	
DBA DPMS FIREARMS/PANTHER)	
ARMS,)	
)	
Defendants.)	
)	

**ANSWER OF PLAINTIFF/COUNTERCLAIM DEFENDANT DANIEL DEFENSE TO
DEFENDANT REMINGTON ARMS COMPANY, LLC'S COUNTERCLAIM.**

For its answer to the Defendant Remington Arms Company, LLC's Counterclaim, the Plaintiff/Counterclaim Defendant Daniel Defense, Inc. ("Daniel Defense") admits only as much as may be specifically admitted herein and further states and alleges as follows:

PARTIES

1. Admitted.
2. Admitted.

JURISDICTION

3. Admitted.
4. Admitted.

VENUE

5. Admitted.

FACTS

6. Admitted.

7. Admitted.

8. Daniel Defense is without information sufficient to determine the truth or falsity of the allegations in Paragraph 8, and therefore denies same.

9. Denied.

10. Denied.

11. Denied.

COUNT I

DECLARTORY JUDGMENT OF TRADEMARK NON-INFRINGEMENT

12. This paragraph does not contain any claim for relief or facts in support of a claim to which a response is required.

13. Admitted.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

COUNT II

CANCELLATION OF TRADEMARK REGISTRATION NOS. 4,079,660 AND 4,469,889

19. This paragraph does not contain any claim for relief or facts in support of a claim to which a response is required.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

PRAYER FOR RELIEF

Daniel Defense denies that Remington Arms Company, LLC is entitled to any relief whatsoever.

This the 17th day of November, 2014.

/s/ Justin Charles Ward

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/s/ Robert M. Ward

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Attorneys for Plaintiff Daniel Defense, Inc.

CERTIFICATE OF SERVICE

I do hereby certify that this 17th day of November, 2014, I served a copy of the foregoing
ANSWER OF PLAINTIFF/COUNTERCLAIM DEFENDANT DANIEL DEFENSE TO
DEFENDANT REMINGTON ARMS COMPANY, LLC'S COUNTERCLAIM in
accordance with the notice of electronic filing requirements on:

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